

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

SONIC INDUSTRIES LLC,	)	
a Delaware limited liability company, and	)	
SONIC FRANCHISING LLC,	)	
a Delaware limited liability company,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 5:24-cv-00474-HE
	)	
LET'S SHAKE, L.L.C.,	)	
a Texas limited liability company,	)	
SUNIL DHAROD, an individual, and	)	
LET'S SHAKE ON IT, L.L.C.,	)	
a Texas limited liability company,	)	
	)	
Defendants.	)	

**DEFENDANTS' UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO SERVE INITIAL DISCLOSURES**

Defendants Let's Shake, L.L.C., Sunil Dharod, and Let's Shake On It, L.L.C. ("Defendants"), by and through undersigned counsel, pursuant to Fed. R. Civ. P. 6 and LCvR 6.3, respectfully move for an extension of the deadline to serve its Rule 26(a)(1) Initial Disclosures (the "Initial Disclosures"), up to and including June 30, 2025, and in support, states as follows:

1. Pursuant to the Scheduling Order entered on June 4, 2025 (Doc. 31), the Initial Disclosures are currently due on June 18, 2025.
2. On May 27, 2025, this Court granted in part Defendants' Motion to Compel Arbitration (Doc. 27), resulting in Defendants' counterclaims being stayed in this matter to be pursued through arbitration.

3. Defendants are currently working with Plaintiffs' counsel to determine the appropriate approach for arbitrating Defendants' counterclaims, and to ascertain what impact this will have on Defendants' affirmative defenses in this matter because of the overlapping facts and issues.

4. As a result of these ongoing negotiations, and the work required to initiate arbitration as to Defendants' counterclaims, Defendants require additional time to fully prepare their Initial Disclosures.

4. Defendants' request is made in good faith and is not sought for the purpose of delay.

5. The requested extension is not opposed and will not unduly prejudice the rights of any party involved in this case.

6. Defendants have previously requested (Doc. 7) and received (Doc. 8) an extension of time in which to answer or otherwise respond to the Complaint in this matter. Defendants also requested (Doc. 13) and received (Doc. 14) an extension of time to file their reply to Plaintiffs' Response to Defendants' Motion to Compel Arbitration.

7. The requested extension will not impact any trial or scheduled deadlines in this matter.

8. A proposed order is submitted contemporaneously herewith.

WHEREFORE, Defendants Let's Shake, L.L.C., Sunil Dharod, and Let's Shake on It, L.L.C., respectfully request that the Court grant Defendants an extension of time in which to serve their Initial Disclosures to June 30, 2025.

DOERNER, SAUNDERS, DANIEL &  
ANDERSON, L.L.P.

By: /s/ Todd L. Grimmett

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*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 16, 2025, I transmitted the attached document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to all ECF Registrants:

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/s/ Todd L. Grimmett

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